

1 Paul T. Trimmer  
Nevada State Bar No. 9291  
2 Lynne K. McChrystal  
Nevada State Bar No. 14739  
3 JACKSON LEWIS P.C.  
300 S. Fourth Street, Suite 900  
4 Las Vegas, Nevada 89101  
Tel: (702) 921-2460  
5 Email: [paul.trimmer@jacksonlewis.com](mailto:paul.trimmer@jacksonlewis.com)  
Email: [lynne.mcchrystal@jacksonlewis.com](mailto:lynne.mcchrystal@jacksonlewis.com)

6 *Attorneys for Defendants Ramparts, LLC*  
7 *dba Luxor Hotel & Casino, New Castle Corp.*  
8 *dba Excalibur Hotel & Casino, Circus Circus Casino Inc.*  
*dba Circus Circus Hotel & Casino*

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 TRUSTEES OF THE NEVADA RESORT  
ASSOCIATION—INTERNATIONAL  
12 ALLIANCE OF THEATRICAL STAGE  
EMPLOYEES AND MOVING PICTURE  
13 MACHINE OPERATORS OF THE UNITED  
STATES AND CANADA, LOCAL 720,  
14 PENSION TRUST; TRUSTEES OF THE  
NEVADA RESORT 'ASSOCIATION  
15 INTERNATIONAL ALLIANCE OF  
THEATRICAL STAGE EMPLOYEES AND  
16 MOVING PICTURE MACHINE OPERATORS  
OF THE UNITED STATES AND CANADA,  
17 LOCAL 720, WAGE DISABILITY TRUST;  
and TRUSTEES OF THE NEVADA RESORT  
18 ASSOCIATION—INTERNATIONAL  
ALLIANCE OF THEATRICAL STAGE  
19 EMPLOYEES AND MOVING PICTURE  
MACHINE OPERATORS OF THE UNITED  
20 STATES AND CANADA, LOCAL 720,  
APPRENTICE AND JOURNEYMAN  
21 TRAINING AND EDUCATION TRUST,

22 Plaintiff,

23 vs.

24 RAMPARTS, LLC dba Luxor Hotel & Casino, a  
Nevada limited liability company; NEW  
25 CASTLE CORP. dba Excalibur Hotel & Casino,  
a Nevada corporation; and CIRCUS CIRCUS  
26 CASINOS INC. d/b/a CIRCUS CIRCUS  
HOTEL & CASINO, a Nevada corporation,

27 Defendants.  
28

**Case No.: 2 :19-cv-01536-RFB-BNW**

**STIPULATION AND ORDER TO  
STAY ACTION UNTIL JULY 13, 2020**

(First Request)

IT IS HEREBY STIPULATED by and between Plaintiffs, TRUSTEES OF THE NEVADA RESORT ASSOCIATION—INTERNATIONAL ALLIANCE OF THEATRICAL STAGE EMPLOYEES AND MOVING PICTURE MACHINE OPERATORS OF THE UNITED STATES AND CANADA, LOCAL 720, PENSION TRUST; TRUSTEES OF THE NEVADA RESORT ASSOCIATION—INTERNATIONAL ALLIANCE OF THEATRICAL STAGE EMPLOYEES AND MOVING PICTURE MACHINE OPERATORS OF THE UNITED STATES AND CANADA, LOCAL 720, WAGE DISABILITY TRUST; and TRUSTEES OF THE NEVADA RESORT ASSOCIATION—INTERNATIONAL ALLIANCE OF THEATRICAL STAGE EMPLOYEES AND MOVING PICTURE MACHINE OPERATORS OF THE UNITED STATES AND CANADA, LOCAL 720, APPRENTICE AND JOURNEYMAN TRAINING AND EDUCATION TRUST (“Plaintiffs”), through their counsel The Urban Law Firm, and Defendants Ramparts, LLC dba Luxor Hotel & Casino, New Castle Corp. dba Excalibur Hotel & Casino,<sup>1</sup> Circus Circus Casinos Inc. dba Circus Circus Hotel & Resort,<sup>2</sup> (“Defendants”) through their counsel Jackson Lewis P.C., that this action be stayed in its entirety for 30 days, until July 13, 2020 (the next business day upon expiration of the 30-day period), with this Court’s approval. This Stipulation is submitted and based upon the following:

1. Due to the public health and safety issues caused by COVID-19, the Parties anticipate significant delays in the discovery process. On March 18, 2020, Defendants temporarily ceased all business operations for health and safety reasons in accordance with Governor Steve Sisolak’s Emergency Directive 002.

2. On March 31, 2020, Governor Sisolak issued Emergency Directive 010 requiring Nevada residents to stay in their homes until April 30, 2020 except to perform work for or obtain goods or services from essential businesses.

3. On April 24, 2020, the Parties filed a Stipulation and Order with this Court (ECF No. 14) seeking to stay the case until June 11, 2020 due to the COVID-19 pandemic. The Court approved and issued an Order on April 29, 2020. ECF No. 15.

---

<sup>1</sup> Defendant New Castle, LLC, is incorrectly named “New Castle Corp.” in the Complaint.

<sup>2</sup> The Complaint incorrectly identifies Circus Circus Casinos, Inc. dba Circus Circus Hotel & Resort as “dba Circus Circus Hotel & Casino.”

1           4.     On April 29, 2020, Governor Sisolak issued Emergency Directive 016 which  
2 orders that gaming establishments “shall remain closed until the Gaming Control Board  
3 determines that operations may safely resume.” In addition, the Governor extended the stay-at-  
4 home order to May 15, 2020.

5           5.     During this time, the Parties have been, and are currently unable to, participate  
6 meaningfully in discovery. Although Defendants have begun a limited resumption of operations,  
7 key labor relations personnel are otherwise unavailable to assist with this matter due to urgent  
8 issues caused by COVID-19 and the focus on resuming operations in a safe manner. Further, the  
9 properties referenced in the Complaint are either closed or just reopening as of this date of his  
10 request. Defendants will continue to evaluate this issue.

11           6.     Due to these circumstances, the Parties agree it is appropriate that this matter be  
12 stayed in its entirety for an additional period of 30 days, until July 13, 2020 (the next business day  
13 after expiration of the 30-day period).

14           7.     Should circumstances change such that a shorter or a longer stay is appropriate, the  
15 parties will immediately and jointly notify the Court.

16           8.     This request is made in good faith and not for the purpose of delay.

17     ///

18     ///

19     ///

20     ///

21     ///

22     ///

23     ///

24     ///

25     ///

26     ///

27     ///

28     ///

1           9.       On July 14, 2020, the Parties will submit a status report to the Court with proposed  
2 revised discovery and scheduling deadlines in the case. Should an additional stay be necessary,  
3 the Parties will submit a request explaining the circumstances and any additional time needed for  
4 stay of this action.

5           Dated this 11th day of June, 2020.

6       **THE URBAN LAW FIRM**

7       **JACKSON LEWIS, P.C.**

8       /s/ Nathan R. Ring

9       /s/ Lynne K. McChrystal

10      Michael A. Urban, Nevada Bar No. 3875

11      Paul T. Trimmer, Esq.

12      Nathan R. Ring, Nevada Bar No. 12078

13      Nevada Bar No. 9291

14      4270 S. Decatur Blvd., Suite A-9

15      Lynne McChrystal, Esq.

16      Las Vegas, NV 89103

17      Nevada Bar No. 14739

18      T: (702) 968-8087

19      300 S. Fourth St, Suite 900

20      F: (702) 968-8088

21      Las Vegas, NV 89101

22      Phone: 702-240-6060

23      *Counsel for Plaintiff Trust Funds*

24      *Counsel for Defendants*

25       **ORDER**

26       IT IS SO ORDERED:

27       

28       \_\_\_\_\_  
RICHARD F. BOULWARE, II  
UNITED STATES DISTRICT JUDGE

DATED this 18th day of June, 2020.